



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

May 29, 2014

Approved OMB 2020-0003
Approval expires 02/28/2017

Ref: 8P-AR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kimball Rasmussen
President and CEO
Deseret Power Electric Cooperative
10714 South Jordan Gateway
South Jordan, Utah 80495

Re: Request for Substantiation of Business Confidentiality Claim

Dear Mr. Rasmussen:

The U.S. Environmental Protection Agency ("EPA" or "Agency") is seeking to determine the entitlement to confidentiality of information submitted to the EPA by Deseret Power on April 17, 2014. The information was submitted in response to a March 26, 2014 request from the EPA under Section 114 of the Clean Air Act. You have claimed part of this information listed in the Enclosure to this letter as confidential business information ("CBI").

This letter is to notify you that the EPA Region 8 Office of Regional Counsel will be making a final confidentiality determination concerning the information you have claimed as CBI. If you feel that some or all of the information is entitled to confidential treatment, you must make the showings below with specific reference to those portions of the information you consider confidential.

Please be specific by page (including Bates Stamp, if applicable), paragraph, and sentence when identifying and substantiating the information subject to your claim. Where your claim, as originally made or as modified by your response to this letter, does not include all information on a page, please attach a copy of each such page with brackets around the text that you claim to be CBI. Any information not specifically identified as subject to a confidentiality claim and substantiated as such in your response to this letter will be disclosed without further notice to you. Please note that if a page, document, group or class of documents claimed by you to be CBI contains a significant amount of information which our

Office of Regional Counsel determines is not CBI, your CBI claim regarding that page, document, group, or class of documents may be denied.

For each item or class of information that you continue to claim as CBI, please answer the following questions, giving as much detail as possible. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled to confidential treatment:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.
5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
7. For each item or category of information claimed as confidential, *explain with specificity* why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
8. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.

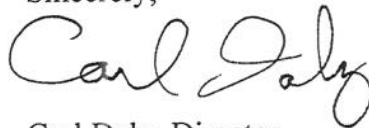
9. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.
10. If you believe any information to be (a) trade secret(s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret(s).
11. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

Your comments must be postmarked or hand delivered to this office, or emailed to owens.mike@epa.gov, by the 15th working day after your receipt of this letter. You may seek an extension of time to submit your comments to this office, but the request must be made before the end of the 15-day period. Except in extraordinary circumstances, no extension will be approved. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

If you wish to claim any information that you provide in your response to this letter to itself be confidential, you must mark the response "**CONFIDENTIAL**" or with a similar designation, and must bracket all text in the response that you so claim. Information so designated will be disclosed by the EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information provided in your response as confidential, it may be made available to the public without further notice to you.

Should you have any questions concerning this matter, please call me at 303-312-6416.

Sincerely,



Carl Daly, Director
Air Program

Enclosure

cc: David Crabtree, Deseret Power
Eric Olsen, Deseret Power

ITEMS PRODUCED

DESCRIPTION	RELATES TO	Confidential Claim
102-01-016 STEAM GENERATOR GENERAL ARRANGEMENT CROSS SECTIO.pdf	1A	Confidential
DD00 POWER PLANT CROSS SECTION.pdf	1A	Confidential
Fastlook - 102-01-015 STEAM GENERATOR GENERAL ARRANGEMENT FRONT CROSS SECTIO.pdf	1A	Confidential
Fastlook - A018 TRANSVERSE SECTION-BOILER AREA .pdf	1A	Confidential
FastLook - DD06A BF-BOILER FUEL.pdf	1A	Confidential
FastLook - GA12 BOILER AREA GROUND FLOOR PLAN EL 5028-0.pdf	1A	Confidential
FastLook - GA13 BOILER AREA PLATFORM EL 5054-3.pdf	1A	Confidential
FastLook - GA14 BOILER AREA PLATFORM EL 5068-5.pdf	1A	Confidential
FastLook - GA15 BOILER AREA PLATFORM EL 5076-7.pdf	1A	Confidential
FastLook - GA16 BOILER AREA PLATFORM EL 5085-11.pdf	1A	Confidential
FastLook - GA17 BOILER AREA PLATFORM EL 5098-5.pdf	1A	Confidential
FastLook - GA18 BOILER AREA PLATFORM EL 5109-11.pdf	1A	Confidential
FastLook - GA19 BOILER AREA PLATFORM EL 5123-6.pdf	1A	Confidential
FastLook - GA20 BOILER AREA PLATFORM EL 5133-0.pdf	1A	Confidential
FastLook - GA21 BOILER AREA FAN PLATFORM EL 5141-8.pdf	1A	Confidential
FastLook - GA22 BOILER AREA PLATFORM EL 5150-9.pdf	1A	Confidential
FastLook - GA23 BOILER AREA PLATFORM EL 5159-3.pdf	1A	Confidential
FastLook - GA24 BOILER AREA PLATFORM EL 5167-9.pdf	1A	Confidential
FastLook - GA25 BOILER AREA PLATFORM EL 5176-3.pdf	1A	Confidential
FastLook - GA26 BOILER AREA PLATFORM EL 5187-9.pdf	1A	Confidential
FastLook - GA27 BOILER AREA INTAKE LOUVER PLATFORM EL 5195-5.pdf	1A	Confidential
FastLook - GA28 BOILER AREA PLATFORM EL 5213-0.pdf	1A	Confidential
FastLook - GA29 BOILER AREA RELIEF LOUVER PLATFORMS EL 5222-4.pdf	1A	Confidential
FastLook - GA30 BOILER AREA PLATFORM EL 5236-9.pdf	1A	Confidential
FastLook - GA31 BOILER AREA ROOF PLAN.pdf	1A	Confidential
FastLook - GA58 PLANT GENERAL ARRANGEMENT.pdf	1A	Confidential
FastLook - GA59 TURBINE AREA TRANSVERSE SECTION.pdf	1A	Confidential
FastLook - GA60 BOILER AREA TRANSVERSE SECTION.pdf	1A	Confidential
FastLook - YGA1 DETAILED YARD GENERAL ARRANGEMENT.pdf	1A	Confidential
FastLook - YGA2 DETAILED YARD GENERAL ARRANGEMENT.pdf	1A	Confidential
reference to previously supplied documents.pdf	1A	Confidential
1B-Rated MW Capacity (1995-2014).pdf	1B	Confidential
Unit Rating 1999 (Page 16).pdf	1B	Confidential
WSCC Letter Bonanza 1 Rating.pdf	1B	
1D-Annual Heat Rate (1995 - 2014).pdf	1D	Confidential
Upper furnace temperatures daily.pdf	1E	Confidential
1F-Coal characteristics (1995 - 2014).pdf	1F	Confidential
1G-Coal & Fuel Oil Consumption (1995 - 2014).pdf	1G	Confidential
Advanced Burner 1997 Report after installation.pdf	1H	Confidential
Air Flow Science Meeting agenda combustion project Sept 2005.pdf	1H	Confidential
Air Flow Science project Final Design Winbox L-04-DG3-SA03 May 2004 (1).pdf	1H	Confidential
Air Monitor project submittal PA Flow Dec 2006.pdf	1H	Confidential
Babcock and Wilcox AireJet Burners Brochure E1013195 2008.pdf	1H	
Babcock and Wilcox Burners 4Z Brochure E1013177 2000.pdf	1H	
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf	1H	Confidential
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf	1H	Confidential
Babcock Power Burner Brochure 2011.pdf	1H	
Babcock Power Burner Brochure 2014.pdf	1H	
Burns and McDonnell FW e-mail Deseret Bonanza NOx.pdf	1H	Confidential
Burns and McDonnell Low NOx Study Proposal Letter June 2013.pdf	1H	Confidential

DESCRIPTION:	RELATES TO:	Confidential Claim
letter of support to Walter Fuqua for Alberta CCEMC.pdf	2B	Confidential
Natural Gas at Bonanza explanation.pdf	2B	Confidential
Natural Gas Installation at Bonanza.pdf	2B	Confidential
Natural Gas Retrofit.pdf	2B	Confidential
Natural Gas Service for Bonanza linda hamilton.pdf	2B	Confidential
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Summary.pdf	2B	Confidential
Why partner with BCES and MMI on bids to Alberta ccemc 01042014.pdf	2B	Confidential

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City, State, ZIP+4	SOUTH JORDAN UT 80495

PS Form 3800, August 2006

See Reverse for Instructions